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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

ADAM ELGINDY and JULIANNE
CHUANROONG, on behalf of themselves, the
general public, and those similarly situated,

Plaintiffs,

v.

AGA SERVICE COMPANY (d/b/a ALLIANZ
GLOBAL ASSISTANCE), JEFFERSON
INSURANCE COMPANY, and BCS
INSURANCE COMPANY,

Defendants.

Case No. 20-cv-06304-JST

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING SCHEDULE
FOR CLASS CERTIFICATION
MOTION**

Pursuant to Civil Local Rule 6-2, Plaintiffs Adam Elgindy and Julianne Chuanroong (“Plaintiffs”) and Defendants AGA Service Company, Jefferson Insurance Company, and BCS Insurance Company (“Defendants”), by and through their respective undersigned counsel, stipulate to an adjournment of the next case management conference and an extension of the schedule for Plaintiffs’ class certification motion, as set forth below.

WHEREAS the parties have participated in numerous conferences and email exchanges regarding Defendants’ discovery responses;

1 WHEREAS, to date, Defendants have produced over 40,000 pages of documents;

2 WHEREAS Defendants met and conferred in January and February on supplementing
3 interrogatory responses and document productions, on identifying deposition dates in March and
4 April for fact witnesses and corporate designees under Rule 30(b)(6), and on stipulating to certain
5 facts to obviate or minimize the need for further productions on certain issues;

6 WHEREAS Defendants made six supplemental document productions in January and
7 February, 2022;

8 WHEREAS Plaintiffs and Defendants continue to work together on stipulated facts, and
9 Defendants are working on supplementing their interrogatory responses and coordinating
10 deposition dates;

11 WHEREAS the parties continue to negotiate the resolution of several issues Plaintiffs
12 have identified in correspondence regarding Defendants' productions and interrogatory responses
13 (most of which the parties expect to resolve privately by confirmation of completeness,
14 supplementation, or stipulation), and the parties expect to resolve those issues or file dispute
15 letters on any those identified pending issues that are not resolved by April 8, 2022;

16 WHEREAS the finalization of deposition dates has been substantially delayed as a result
17 of the foregoing; and

18 WHEREAS this is the parties' second request to modify the class certification briefing
19 schedule in this case and good cause exists for the modification for the reasons identified above
20 and in the accompanying declaration in support;

21 **PLAINTIFFS AND DEFENDANTS HEREBY STIPULATE AND AGREE THAT:**

22 The next case management conference shall be adjourned and the deadlines for class
23 certification briefing shall be extended as set forth below:

24 Event	Current Date	Proposed Date
25 Further case management statement due	March 30, 2022	May 11, 2022
26 Further CMC	April 1, 2022 at 1:30 p.m.	May 13, 2022 at 1:30 p.m.
27 Class certification motion due	May 6, 2022	August 5, 2022
28 Class certification opposition due	July 15, 2022	October 14, 2022

Class certification reply due	September 9, 2022	December 9, 2022
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No further deadlines have been set in this case, and thus the requested modifications will not affect any other case deadlines or dates.

STIPULATED AND AGREED:

DATED: March 11, 2022

s/Stephen M. Raab

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s/Gayle I. Jenkins (by concurrence)

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and BCS INSURANCE COMPANY

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

DATED: March 11, 2022

GUTRIDE SAFIER LLP

By: /s/ Stephen M. Raab /
Stephen M. Raab

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 16, 2022



JON S. TIGAR

United States District Judge